

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CLAYTON SCHWANN et al,

Plaintiffs,

v.

FEDEX GROUND PACKAGE SYSTEM,  
INC.,

Defendant.

Civ. A. No. 1:11-cv-11094-DJC

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE OF ALL PLAINTIFFS  
EXCEPT PLAINTIFF SCHWANN, AND REQUEST FOR 30 DAY STAY TO PERMIT  
FURTHER SETTLEMENT DISCUSSIONS**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), it is hereby stipulated and agreed upon by and among the parties in the above-captioned matter, acting through their counsel, that all claims asserted by Plaintiffs Lawrence Adams, Jeff Baylies, James Duggan, Ramon Heleodoro, Thomas Leduc, Phinnias Muchirahondo, Robert Sangster, Temistocles Santos, and Eric Vitale in this action against Defendant FedEx Ground Package System, Inc. shall be dismissed with prejudice.

The claims of Plaintiff Clayton Schwann are not affected by this stipulation and remain pending. However, the parties respectfully request the Court to stay any decision on the Plaintiffs' motion for summary judgment for thirty (30) days to allow the parties time for settlement negotiations between Plaintiff Schwann and the Defendant.

Dated: November 30, 2016

Respectfully submitted,

CLAYTON SCHWANN, THOMAS LEDUC,  
MARVIN SANTIAGO, RAMON  
HELEODORO, JAMES DUGGAN, ERIC  
VITALE, PHINNIAS MUCHIRAHONDO,  
TEMISTOCLES SANTOS, LAWRENCE  
ADAMS, JEFF BAYLIES, and ROBERT  
SANGSTER,

By their attorneys,

/s/ Harold L. Lichten

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FEDEX GROUND PACKAGE SYSTEM,  
INC.

By its attorneys,

/s/ James C. Rehnquist

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**CERTIFICATE OF SERVICE**

I, Harold Lichten, certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 30, 2016.

/s/ Harold Lichten

Harold Lichten